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Attorneys for Defendant
CITY AND COUNTY OF HONOLULU

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

THE ESTATE OF ERIC A.
POWELL, THROUGH PERSONAL
REPRESENTATIVE MARY K.
POWELL; THE ESTATE OF
JAMES D. LAUGHLIN, THROUGH
PERSONAL REPRESENTATIVE
REGINAE C. LAUGHLIN; MARY K.
POWELL, INDIVIDUALLY;
REGINAE C. LAUGHLIN,
INDIVIDUALLY; CHLOE
LAUGHLIN, A MINOR, THROUGH
HER NEXT FRIEND, REGINAE C.
LAUGHLIN,

Plaintiffs,

vs.

CITY AND COUNTY OF
HONOLULU,

Defendants.

Civil No. CV04 00428 DAE-LEK

DEFENDANT CITY AND COUNTY
OF HONOLULU'S FIRST
SUPPLEMENTAL RESPONSE TO
PLAINTIFFS' FIRST REQUEST
FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT
CITY AND COUNTY OF
HONOLULU DATED
DECEMBER 21, 2004
[Bate Stamp 00001 - 00164]

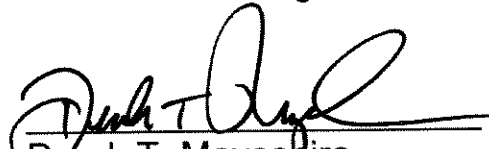
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EXHIBIT "38"

11. Please produce all documents related to any City and County Hanauma Bay employee manual, instructions or procedures related to any employee position in the vicinity of the beach, including any such documents related to Daniel Neves, Ron Brogham, William Goodwin and Robb Dorr's positions as well as the Lifeguard and Beach Information Manager position.

Answer:

Objection. Overly broad. Unduly burdensome. Vague and ambiguous. Violates copyright laws.



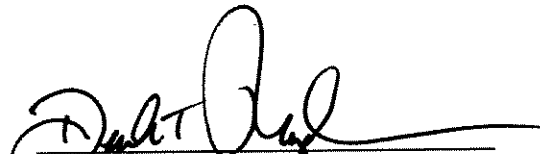
Derek T. Mayeshiro

See attached documents.

12. Please produce all documents or signage related to any City warnings or safety instructions related to the hotel pool or the ocean, including any warnings or instructions that were allegedly given to Plaintiffs.

Answer:

Objection. Overly broad. Unduly burdensome. Vague and ambiguous.



Derek T. Mayeshiro

See attached documents.